

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

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MANDY BLANKENSHIP,  
Plaintiff,

vs.

CASE NO.

Judge  
Magistrate Judge

MONTEREY FINANCIAL  
SERVICES, INC. d/b/a MONTEREY  
COLLECTION SERVICES, a  
California corporation; TRANS  
UNION, LLC, a Delaware company;  
and EQUIFAX INFORMATION  
SERVICES, LLC, a Georgia company;  
Defendants.

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**TRANS UNION, LLC'S NOTICE OF REMOVAL**

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Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union,  
LLC (“Trans Union”) hereby removes the subject action from the 51st Judicial  
District, Oakland County, Michigan, to the United States District Court for the  
Eastern District of Michigan, on the following grounds:

1. Plaintiff Mandy Blankenship served Trans Union on or about  
September 18, 2017, with a Summons and Complaint filed in the 51st District  
Court, Oakland County, Michigan. Copies of the Summons and Complaint,  
redacted pursuant to Federal Rule of Civil Procedure 5.2, are attached hereto as

**Exhibit A** and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.

2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). See Complaint ¶¶ 12, 26-31 and 33-38.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the 51st District Court, Oakland County, Michigan, to the United States District Court for the Eastern District of Michigan.

5. Counsel for Trans Union has confirmed with the 51st District Court, Oakland County, Michigan, by telephone, that they have no document or file suggesting any other Defendant has been served. To the best of Trans Union’s knowledge, no other named Defendant in this matter has been served as of the date and time of this Notice Of Removal.

6. Notice of this removal will promptly be filed with the 51st Judicial District, Oakland County, Michigan and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the 51st Judicial District, Oakland County, Michigan to this United States District Court, Eastern District of Michigan.

Respectfully submitted,

*s/ William M. Huse*

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Sandra Davis Jansen, Esq. (IN #27803-53)

William M. Huse, Esq. (IN #31622-49)

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*Counsel for Trans Union, LLC*

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CERTIFICATE OF SERVICE

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I, **William M. Huse**, hereby certify that on the **20th day of September, 2017**, I electronically filed the foregoing with the Clerk of the Court using the ECF systems which will automatically send notification of such filing to the following counsel of record:

None.	
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I further certify that on the **20th day of September, 2017**, a copy of the foregoing was sent via U.S., First Class Mail, postage prepaid to the following non-ECF participants:

<b><u>for Plaintiff Mandy Blankenship</u></b> Gary D. Nitzkin, Esq. Travis Shackelford, Esq. Carl Schwartz, Esq. Credit Repair Lawyers of America 22142 West Nine Mile Road Southfield, MI 48033	
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Respectfully submitted,

*s/ William M. Huse*

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*Counsel for Trans Union, LLC*